

1 JONATHAN A. PATCHEN (SBN 237346)
2 TAYLOR & PATCHEN, LLP
3 One Ferry Building, Suite 355
4 San Francisco, California 94111
5 Telephone: (415) 788-8200
6 Facsimile: (415) 788-8208
7 E-mail: jpatchen@taylorpatchen.com

8 Attorneys for Non-Party LIOR RON

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 WAYMO, LLC,
12 Plaintiff,
13 vs.
14 UBER TECHNOLOGIES, INC;
15 OTTOMOTTO LLC; and OTTO TRUCKING
16 LLC,
17 Defendants.

Case No.: 3:17-CV-00939 (WHA)
**DECLARATION OF JONATHAN
PATCHEN IN SUPPORT OF NONPARTY
LIOR RON'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**
Magistrate Judge Jacqueline S. Corley

I, JONATHAN PATCHEN, declare as follows:

1. I am a partner in the law offices of Taylor & Patchen, LLP, a member in good standing of the bar of the State of California, and am admitted to practice before the United States District Court for the Northern District of California. I have personal knowledge of the matters set forth in this declaration, and if called upon to testify as a witness in this case, I could and would testify competently under oath to all of the matters set forth in this declaration.

2. This declaration is submitted in support of Nonparty Lior Ron's Administrative Motion to File Under Seal confidential information in his Letter Brief in Response to Waymo's Motion to Compel Inspection of Images ("Response").

10 3. Specifically, Mr. Ron's Response contains information, highlighted in yellow in the
11 footnote at page 1 that make reference to materials designated as "Confidential" and/or "Highly
12 Confidential" by Defendants, Anthony Levandowski, and/or other third parties to this action.
13 These materials are attached as Exhibit 2 to Waymo's Motion to Compel Inspection of Images,
14 filed under seal at Dkt. 1785-2.

15 4. Also, Mr. Ron's Response contains information, highlighted in yellow in Exhibit 1
16 to the Declaration of Jonathan Patchen that make reference to materials designated as
17 "Confidential" and/or "Highly Confidential" by Defendants, Anthony Levandowski, and/or other
18 third parties to this action.

19 I declare under penalty of perjury, under the laws of the United States of America, that the
20 foregoing is true and correct. Executed this 26th day of September, 2017, at San Francisco,
21 California.

/s/ Jonathan A. Patchen

JONATHAN A. PATCHEN